

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
)
v.) **Criminal No. 20-10177-PBS**
)
AMIN KHOURY,)
)
)
Defendant)

STIPULATIONS

In lieu of live testimony, and for purposes of trial, the Government and Defense have agreed to the following stipulations. The parties have agreed that these stipulations will not be read to the jury. Additionally, the parties reserve the right to propose redactions to any document listed in these stipulations if the document will be offered in evidence.

I. AUTHENTICITY OF BUSINESS RECORDS

The Government and Defense stipulate and agree that the following records are accurate and authentic business records:

- a. Records received from the Department of the Treasury's Financial Crimes Enforcement Network pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.
- b. Records received from the Internal Revenue Service pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.
- c. Records received from Wells Fargo Bank pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.
- d. Records received from American Express pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.

- e. Records received from Bank of America pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.
- f. Records received from PNC Bank pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.
- g. Records received from JPMorgan Chase & Co. pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.
- h. Records received from Santander Bank pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.

Notwithstanding the foregoing, the parties may still object to these records on other grounds, such as relevance or prejudice. These records may be admitted in redacted form and the parties agree that redacted versions of these records are authentic.

II. AUTHENTICITY OF RECORDS FROM CERTAIN ENTITIES

The parties stipulate and agree that the following documents are accurate and authentic representations of records:

- a. Records obtained from the Defendant's email account, AKhoury@sailfishventures.com, received pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.
- b. Records from Middlesex High School and Georgetown University received pursuant to a formal request for records, including the records identified in the exhibit lists filed by the Government and Defense.

Notwithstanding the foregoing, the parties may still object to these records on other grounds, such as hearsay, relevance, or prejudice.

Respectfully submitted,

RACHAEL S. ROLLINS
United States Attorney

By: /s/ Christopher J. Markham
CHRISTOPHER J. MARKHAM
KRISTEN A. KEARNEY
Assistant United States Attorneys

AMIN KHOURY
Defendant

By: /s/ Eóin P. Beirne
EOIN P. BEIRNE
Counsel for Amin Khoury

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: April 29, 2022

/s/ Christopher J. Markham

Christopher J. Markham

Assistant United States Attorney